

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PHT CORPORATION,)	
)	
Plaintiff,)	
v.)	Civil Case No. 04-60 GMS
)	
INVIVODATA, INC.,)	
)	
Defendant.)	
)	
PHT CORPORATION,)	
)	
Plaintiff,)	
v.)	Civil Case No. 04-61 GMS
)	
CRF, INC.,)	
)	
Defendant.)	
)	
PHT CORPORATION,)	
)	
Plaintiff,)	
v.)	Civil Case No. 04-821 GMS
)	
ETRIALS WORLDWIDE, INC.,)	
)	
Defendant.)	
)	

NOTICE OF 30(b)(6) DEPOSITION TO INVIVODATA, INC.

PLEASE TAKE NOTICE that commencing at 9:30 am on August 18, 2005 at the offices of Young Conaway Stargatt & Taylor, L.L.P., The Brandywine Building, 1000 West Street, 17th Floor, P.O. Box 391, Wilmington, Delaware 19899-0391, PHT Corporation (“PHT”),

through its attorneys, will take the deposition of invivodata, Inc. ("invivodata") pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

Invivodata shall designate one or more of its directors, officers, managing agents, or other persons who will testify on behalf of invivodata as to all information known or reasonably available to invivodata regarding the topics listed in Appendix A.

The deposition will take place upon oral examination before a notary public or other person authorized to administer oaths, will be recorded by stenographic and sound-and-video means, and will continue from day to day until completed. PHT requests that invivodata notify counsel for PHT in writing of the names of the person or persons designated to testify on behalf of invivodata as soon as practical after such designations have been made.

Respectfully submitted,



Josy W. Ingersoll (#1088)
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Dated: July 18, 2005

Attorneys for PHT Corporation

Appendix A

1. All facts relating to the allegations raised in paragraphs 42-45 of invivodata's Counterclaim and the identity of all individuals and entities that have knowledge related to those facts.
2. The entities with actual and prospective business relationships with invivodata with whom PHT allegedly discussed the present lawsuit, including but not limited to, the names of those entities and the name and contact information of the individuals at those entities with whom those conversations took place.
3. The content of alleged statements by PHT representatives to the entities with actual and prospective business relationships with invivodata regarding the present lawsuit.
4. The invivodata employees or representatives who learned about the alleged conversations between PHT (or PHT representatives) and the entities with actual and prospective business relationships with invivodata regarding the present lawsuit.
5. The damages has invivodata suffered "as a direct and proximate cause" of PHT's alleged statements the entities with actual and prospective business relationships with invivodata regarding the present lawsuit, and the identity of all individuals and entities that have knowledge related to those damages.

CERTIFICATE OF SERVICE

I, Josy W. Ingersoll, Esquire, hereby certify that on July 18, 2005, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that on July 18, 2005, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

BY FEDERAL EXPRESS

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